

**THE UNITED STATES BANKRTUPCY COURT
FOR THE EASTERN DISTRICT OF PENNSYVALNIA**

In re: : Case No: 17-12155
Paul D. Breyer :
Debtor : Chapter 7

DEBTORS' MOTION TO REOPEN CASE

Pursuant to 11 U.S.C. § 350(b), Debtor Paul D. Breyer (“Debtor”), hereby requests this Honorable Court reopen the above-captioned Chapter 7 Bankruptcy case to accord relief to Debtor for the following reasons:

1. Debtor filed a voluntary Chapter 7 of the Bankruptcy petition or about March 29, 2017.
2. Debtor identified Discover Bank (“Discover”) as a creditor on his bankruptcy schedules.
3. Prior to the filing of Debtor’s petition, Discover obtained and recorded a prejudgment writ of attachment against certain real property owned by Debtor in Philadelphia Municipal Court No. SC-16-05-02-3127 on or about February 10, 2017.
4. Said property included 2661 Elbridge Street, Philadelphia, Pennsylvania 19149.
5. On or about August 25, 2017, this Court granted Debtor a discharge pursuant to 11 U.S.C. § 727.
6. A bankruptcy case may be reopened under 11 U.S.C. § 350(b) in order to “administer assets, to accord relief to the debtor, or for other cause.”
7. Said avoidance constitutes relief within the meaning of 11 U.S.C. § 350(b).

8. As such, Debtor respectfully requests this Honorable Court allow Debtor to reopen this Chapter 7 filing.

WHEREFORE, for at least the foregoing reasons, Debtor hereby respectfully requests this Honorable Court reopen this Chapter 7 case under 11 U.S.C. § 350(b).

Respectfully submitted,

Kenny, Burns & McGill.

By: /s/Thomas D. Kenny

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Dated: February 23, 2018

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Debtor's Motion to Reopen Case was served this 23rd day of February 2018, on the following by first-class mail and/or electronic filing system:

Christine C. Shubert, Trustee
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